

1 MICHAEL A. JACOBS (CA SBN 111664)  
2 MJacobs@mofo.com  
3 ARTURO J. GONZÁLEZ (CA SBN 121490)  
AGonzalez@mofo.com  
3 MORRISON & FOERSTER LLP  
4 425 Market Street  
San Francisco, California 94105-2482  
5 Tel: 415.268.7000 / Fax: 415.268.7522

6 KAREN L. DUNN (*Pro Hac Vice*)  
kdunn@bsfllp.com  
7 HAMISH P.M. HUME (*Pro Hac Vice*)  
hhume@bsfllp.com  
8 BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, N.W.  
Washington DC 20005  
9 Tel: 202.237.2727 / Fax: 202.237.6131

10 WILLIAM CARMODY (*Pro Hac Vice*)  
bcarmody@susmangodfrey.com  
11 SHAWN RABIN (*Pro Hac Vice*)  
srabin@SusmanGodfrey.com  
12 SUSMAN GODFREY LLP  
1301 Avenue of the Americas, 32nd Floor  
13 New York, NY 10019-6023  
14 Tel: 212.336.8330 / Fax: 212.336.8340

15 Attorneys for Defendants  
16 UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,

Case No. 3:17-cv-00939-WHA

21 Plaintiff,

**DECLARATION OF ESTHER KIM  
CHANG IN SUPPORT OF  
DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S OPPOSITION TO  
WAYMO'S MOTION FOR LEAVE TO  
FILE AMENDED LIST OF ELECTED  
TRADE SECRETS, SUPPLEMENTAL  
EXPERT REPORTS, AND REVISED  
WITNESS AND EXHIBIT LISTS**

22 v.

23 UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING  
24 LLC,

25 Defendants.

26 Trial Date: December 4, 2017

1 I, Esther Kim Chang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in  
 3 good standing of the Bar of the State of California. I make this declaration based on personal  
 4 knowledge and, if called as a witness, I could and would testify competently to the matters set  
 5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and  
 6 Ottomotto LLC's Opposition to Waymo LLC's Motion to for Leave to File Amended List of  
 7 Elected Trade Secrets, Supplemental Expert Reports, and Revised Witness and Exhibit Lists.

8 2. Attached as Exhibit 1 is a true and correct copy of an email from me, as counsel  
 9 for Uber and Ottomotto, to Felipe Corredor, counsel for Waymo, dated August 16, 2017.

10 3. Attached as Exhibit 2 are true and correct copies of relevant pages from Waymo's  
 11 confidentiality designations to the August 18, 2017 deposition of Don Burnette served on  
 12 August 25, 2017.

13 4. Attached as Exhibit 3 are true and correct copies of relevant pages from Waymo's  
 14 confidentiality designations to the August 18, 2017 deposition of Don Burnette served on  
 15 October 19, 2017.

16 5. Attached as Exhibit 4 is a true and correct copy of an article by C. Katrakazas,  
 17 et al., titled "Real-time Motion Planning Methods for Autonomous On-Road Driving; State-of-  
 18 the-Art and Future Research Directions."

19 6. Attached as Exhibit 5 are true and correct copies of relevant pages from the  
 20 October 17, 2017 deposition of Mary Fulginiti.

21 7. Attached as Exhibit 6 are true and correct copies of relevant pages from the  
 22 July 28, 2017 deposition of Samuel Lenius.

23 8. Attached as Exhibit 7 are true and correct copies of relevant pages from the  
 24 August 24, 2017 deposition of Christian Lauterbach.

25 9. Attached as Exhibit 8 are true and correct copies of relevant pages from the  
 26 July 26, 2017 deposition of Zachary Morris.

27 10. Attached as Exhibit 9 is a true and correct copy of a document produced in this  
 28 litigation on September 13, 2017, bearing Bates numbers UBER00312645 to UBER00312653.

11. Attached as Exhibit 10 is a true and correct copy of a document produced in this litigation on October 24, 2017, bearing Bates number SFM00001557.

12. Attached as Exhibit 11 is a true and correct copy of an email from Felipe Corredor (counsel for Waymo) to Arturo Gonzalez (counsel for Uber) dated June 18, 2017.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day of October, 2017 at San Francisco, California.

/s/    Esther Kim Chang  
ESTHER KIM CHANG

## ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Esther Kim Chang has concurred in this filing.

Dated: October 25, 2017

/s/ Arturo J. González  
Arturo J. González